

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**ROTHSCHILD BROADCAST  
DISTRIBUTION SYSTEMS, LLC,**

**Plaintiff,**

**v.**

**MOBILE VIDEO SOLUTIONS, INC.,**

**Defendant.**

**CIVIL ACTION NO. 1:21-cv-00631-MN**

**PLAINTIFF ROTHSCHILD BROADCAST DISTRIBUTION SYSTEMS, LLC'S  
ANSWERS AND DEFENSES TO  
DEFENDANT MOBILE VIDEO SOLUTIONS, INC.'S COUNTERCLAIMS**

Now comes Plaintiff, Rothschild Broadcast Distribution Systems, LLC (“Plaintiff,” “Counterclaim Defendant,” or “RBDS”), by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 12, without admission of the legal sufficiency thereof and responding only to the factual allegations therein, and states as follows for its Answer and Defenses to Defendant and Counter Plaintiff Mobile Video Solutions, Inc.’s (“Defendant,” “Counterclaim Plaintiff,” or “Mobile Video”) Counterclaims [DI. 9] (hereafter the “Counterclaims”) as follows:

**PARTIES**

1. RBDS has insufficient knowledge of the allegations contained in paragraph 1 and therefore denies same.

2. Admitted.

**JURISDICTION**

3. RBDS incorporates by reference each of its answers in paragraphs 1-2 above.

4. RBDS admits that jurisdiction is proper.

5. Admitted.

6. RBDS admits that venue is proper. RBDS denies any remaining allegations in paragraph 6.

**COUNT I**

7. RBDS incorporates by reference each of its answers in paragraphs 1-6 above.
8. RBDS admits that an actual controversy exists concerning infringement of the '221 Patent. RBDS denies any remaining allegations contained in paragraph 8.
9. Denied.
10. RBDS admits that Mobile Video seeks a declaratory judgment. RBDS denies any remaining allegations contained in paragraph 10.

**COUNT II**

11. RBDS incorporates by reference each of its answers in paragraphs 1-10 above.
12. RBDS admits that an actual controversy exists regarding validity of the '221 Patent. RBDS denies any remaining allegations contained in paragraph 12.
13. Denied.
14. RBDS responds that the referenced document speaks for itself.
15. RBDS responds that the referenced document speaks for itself.
16. RBDS admits that Mobile Video seeks a declaratory judgment. RBDS denies any remaining allegations contained in paragraph 16.

**PRAYER FOR RELIEF**

To the extent a response is required, RBDS denies that Mobile Video is entitled to any of the relief requested.

Dated: June 16, 2021

Respectfully Submitted,

**GAWTHROP GREENWOOD, PC**

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*/s/ David W. deBruin*

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**ATTORNEYS FOR PLAINTIFF**